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14 MARTIN SCHNEIDER, et al., individually and on  
15 behalf of all others similarly situated,  
16 Plaintiffs,  
17 v.  
18 CHIPOTLE MEXICAN GRILL, INC.,  
19 Defendants.

Case No. 4:16-cv-02200-HSG (KAW)

**CLASS ACTION**

**DECLARATION OF LAURENCE D. KING  
IN SUPPORT OF PLAINTIFFS'  
UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF  
PROPOSED SETTLEMENT, TO AMEND  
COMPLAINT FOR SETTLEMENT  
PURPOSES, AND TO MODIFY CLASS  
DEFINITIONS**

Judge: Hon. Haywood S. Gilliam, Jr.  
Courtroom: 2, 4th Floor  
Date: January 16, 2020  
Time: 2:00 p.m.

1 I, Laurence D. King, declare as follows:

2 1. I am a partner at Kaplan Fox & Kilsheimer LLP, counsel for plaintiffs Martin Schneider,  
3 Sarah Deigert, Theresa Gamage, and Nadia Parikka (“Plaintiffs”), and the Classes. I submit this  
4 declaration in support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Proposed  
5 Settlement, to Amend Complaint for Settlement Purposes, and to Modify Class Definitions. If called a  
6 witness, I could and would testify competently thereto to all facts within my personal knowledge.

7 1. Attached hereto as **Exhibit 1** is a true and correct copy of the Stipulation of Settlement  
8 entered into by Plaintiffs and Defendant Chipotle Mexican Grill, Inc., on September 11, 2019.

9 2. Attached hereto as **Exhibit 2** is a true and correct copy of the proposed Amended Class  
10 Action Complaint.

11 3. Attached hereto as **Exhibit 3** is a true and correct copy of the firm résumé for Kaplan Fox  
12 and Kilsheimer LLP.

13 4. Attached hereto as **Exhibit 4** is a true and correct copy of the firm résumé for Kobre &  
14 Kim LLP.

15 5. Attached hereto as **Exhibit 5** is a true and correct copy of the lodestar and the costs and  
16 expenses as of August 31, 2019 for Kaplan Fox & Kilsheimer LLP and Kobre & Kim LLP. Expenses  
17 do not include charges by Court-approved notice administrator KCC Class Action Services for notice  
18 administration.

19 6. Attached hereto as **Exhibit 6** is a true and correct copy of the résumé for the proposed  
20 Claims Administrator, Angeion Group. Angeion Group has estimated that it will cost \$600,000 to fully  
21 administer the settlement of this case.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed this 11th day of September, 2019, at San Francisco, California.

24 /s/ Laurence D. King  
25 Laurence D. King